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February 28, 2006
File No. 9135

Timothy D. McNair, Esquire
Law office of Timothy D. McNair
821 State Street
Erie, PA 16501

Re: Abby B. Conley vs. County of Erie, Erie County Office of Children and Youth, a/k/a Erie County Child Welfare Service, Richard Schenker, Peter Callan, Debra Liebel, and John A. Onorato, Esquire
U.S. District Court for the Western District of Pennsylvania – Erie Division
Civil Action No.: 05-CV-76 E

Dear Mr. McNair:

On January 9, 2006, I served you with Defendant John A. Onorato's Third Set of Interrogatories and Request for Production of Documents Directed to the Plaintiff. I still have not received a response. I would appreciate your advising me as soon as possible whether a response is forthcoming, or whether I will be required to file another Motion to Compel in order to obtain a response.

Additionally, I have received the Plaintiff's Supplemental Answers, Responses and Objections containing the records of Dr. Kalata. The letter from Mr. Angelone indicated that you are continuing to collect further medical records responsive to the Requests. I would appreciate your providing me with a list of healthcare providers from whom you have requested records which are still outstanding, as well as the dates you requested the records. Please provide me with a time frame when you believe I will be receiving a complete set of records.

Thank you for your anticipated cooperation regarding this matter. I look forward to hearing from you.

Very truly yours,

Mark R. Lane

MRL/pls
Cc: Edmond R. Joyal, Esquire
Anthony Angelone, Esquire

EXHIBIT
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